

*Felony*

## UNITED STATES DISTRICT COURT

United States District Court  
Southern District of Texas  
FILED

OCT 17 2016

for the  
Southern District of Texas

David J. Bradley, Clerk of Court

United States of America  
v.  
Brittany VANDESTEENE  
YOB: 1988  
COB: USA

Case No.

*B-16-MJ-987**Defendant*

## CRIMINAL COMPLAINT

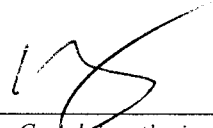
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of October 16, 2016 in the county of Cameron in the Southern District of Texas, the defendant violated 18 & 22 U. S. C. § 554 & 2778 (respectively)  
an offense described as follows:


knowingly and willfully export and cause to be exported into the United Mexican States from the United States of America a defense article, that is, to wit: 3,749 cartridges of ammunition, one Glock 17 handgun (serial # BBPZ292), and one Glock 19 handgun (serial # GPK511); which are designated as defense articles on the United States Munitions List (22 CFR, Chapter 1, Part 121), without having first obtained from the Department of State a license for such export or written authorization for such export.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet  
Complainant's signatureWilliam B. McCarthy, HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/17/2016City and state: Brownsville, Texas  
Judge's signatureRonald G. Morgan, U.S. Magistrate  
Printed name and title

B-16-MJ-987

On October 16, 2016, Customs and Border Protection (CBP) Officers encountered Brittany Renee VANDESTEENE as she attempted to make entry at the Veterans International Port of Entry (POE) in Brownsville, Texas. When encountered, VANDESTEENE was driving a 2008 Hyundai Elantra registered to VANDESTEENE. VANDESTEENE declared she had some ammunition in the vehicle but less than one box to CBP Officer working the primary inspection lane. A CBP canine alerted to VANDESTEENE's vehicle and the primary officer referred VANDESTEENE to secondary inspection. A subsequent search of VANDESTEENE's vehicle revealed a total of 3,749 rounds of ammunition concealed within the vehicle. The ammunition discovered was 2,839 rounds of 7.62 caliber ammunition, 200 rounds of .40 caliber ammunition, 200 rounds of .45 caliber ammunition, and 510 rounds of 9mm ammunition. There was also one (1) Glock 17 handgun (serial #BBPZ292) with magazine and one (1) Glock 19 handgun (serial # GPK511) with magazine broken down and concealed with the ammunition. The ammunition and firearms were concealed within the spare tire well in the trunk of the vehicle.

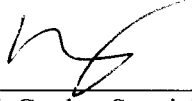
Homeland Security Investigations (HSI) Special Agents (SA) Gustavo Gonzalez and William McCarthy of the Assistant Special Agent in Charge, Harlingen, Texas (ASAC HG) office assigned to the Rio Grande Valley-Border Enforcement Security Taskforce (RGV-BEST), responded to the Veterans International POE in Brownsville, TX.

VANDESTEENE read and was explained her rights as per Miranda in the English language by HSI SAs Gonzalez and McCarthy. VANDESTEENE waived her right to have an attorney present and voluntarily provided a statement.

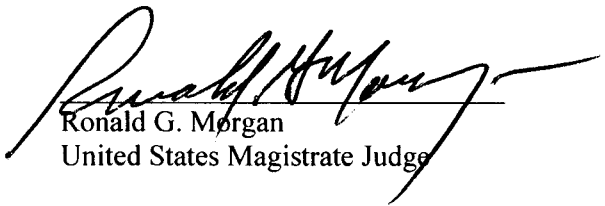
VANDESTEENE stated an individual she knew as "Pablo" put the ammunition in the trunk of her vehicle in Houston on the morning of October 16, 2016. VANDESTEENE stated that Pablo paid her one hundred dollars (\$100.00) to drive the ammunition from Houston, Texas to Brownsville, Texas, where she would meet an individual she knew as "Mario" and give him the ammunition. There, Mario would pay VANDESTEENE an additional nine hundred dollars (\$900.00). VANDESTEENE stated that while she was driving, Mario called her and directed her to take it to Mexico.

VANDESTEENE stated she was stopped by Mexican customs officials as she crossed from the United States into Mexico and directed to return to the United States because she only had temporary paper license plates on her vehicle and she could not drive it in Mexico without permanent plates. VANDESTEENE stated she was on the phone with Mario while this was going on and handed the phone to the customs officer to speak with Mario because she did not understand Spanish. VANDESTEENE stated Mario talked to the officer over the phone and then explained to VANDESTEENE that she had to go back to the United States. Mario instructed VANDESTEENE to call him when she was through the POE and back in the United States.

VANDESTEENE, a United States citizen, was arrested and charged with violating 18 USC 554 (Smuggling goods from the United States) and 22 USC 2778 (Illegal exportation of firearms or ammunition). Assistant United States Attorney (AUSA) Elena Salinas accepted the case for federal prosecution.

  
\_\_\_\_\_  
William McCarthy, Special Agent  
Homeland Security Investigations

Sworn to before me and signed in my presence on October 17, 2016, in Brownsville, Texas:

  
\_\_\_\_\_  
Ronald G. Morgan  
United States Magistrate Judge